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April 3, 2019

Via ECF Filing and FedEx

Hon. Joseph A. Dickson, U.S.M.J.  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Courtroom MLK 2D  
Newark, New Jersey 07102

Re: Ever Bedoya, *et al.* v. American Eagle Express, Inc.  
Docket No. 2:14-cv-02811-ES-JAD

Dear Judge Dickson:

The parties submit this joint letter to provide the Court with a status update in the above-referenced matter. Defendant, American Eagle Express, Inc., has decided to file a Petition to the United States Supreme Court, seeking review of the Third Circuit's decision, which affirms the District Court's denial of Defendant's Motion for Judgment on the Pleadings. The Petition is due to be filed with the United States Supreme Court no later than April 29, 2019. Upon the filing of this Petition, Defendant will file a motion to stay the proceedings in the District Court, pending the conclusion of the Supreme Court proceedings.

Counsel for Defendant has conferred with counsel for Plaintiffs on these issues. Counsel for Plaintiffs have indicated that Plaintiffs will not consent to the stay in the District Court. Rather, Plaintiffs will ask the District Court to set a schedule to move the proceedings forward on their anticipated motion for class certification and the merits, irrespective of the Supreme Court Petition. Specifically, Plaintiffs would request that the Court set a deadline for their class certification motion that is either (i) three months after the Court rules on Defendant's motion to stay; or (ii) July 26, 2019. Such a schedule will allow Plaintiffs to complete the remaining discovery for their class certification motion.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Joseph C. DeBlasio  
Joseph C. DeBlasio

JCD/KMD